

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re: THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, as representative of THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i> Debtors.	PROMESA Title III Case No. 17 BK 3283-LTS (Jointly Administered)
In re: THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, as representative of PUERTO RICO SALES TAX FINANCING CORPORATION (COFINA), Debtor.	PROMESA Title III Case No. 17 BK 03284-LTS Claim Number: 44958; 44374 & 44834 Re Docket No. 4420

**RESPONSE TO PUERTO RICO SALES TAX FINANCING CORPORATION'S
SIXTEENTH OMNIBUS OBJECTION TO DUPLICATE CLAIMS TO THE
HONORABLE COURT:**

Comes now, Creditor, Reinaldo Vincenty Perez ("VINCENTY") and submits his response to COFINA Sixteenth Omnibus Objection to proof of claims number 44958; 44374 & 44834. In support of his claim, Vincenty respectfully STATES and PRAYS as Follows:

1. On May 30, 2018, Vincenty filed several Proof of Claim arising out of COFINA Bonds owed by Vincenty which include proof of claims number 44958; 44374 & 44834.

POC No.	Type	CUSIP	AMOUNT
44958	Cofina Bond	74529JLE3	\$300,000.00

44374	Cofina Bond	74529JGQ2	\$1,015,000.00
44834	Cofina Bond	74529JAC9	\$890,000.00

2. On December 5, 2018, COFINA filed its Sixteenth Omnibus Objection (Docket Entry 4420) allegedging that POC NO. 44958; 44374 & 44834 were duplicate proofs of claims listed in Exhibit A inasmuch the the trustee for the series of bonds related to these claims had filed a master proof of claim on his behalf.

3. However, the appearing creditor has noticed that this alleged master proof of claim does not accounts for all its proof of claims actually filed to which he is entitled to.

4. Specifically, on the same date in which POC NO. 44958; 44374 & 44834 were filed to wit, May 30 2018, the appearing creditor also filed three additional COFINA BOND claims described as follows:

Exhibit	Date Filed	Type	CUSIP	AMOUNT
A	May 30 2018	Cofina Bond	74529JNL5	\$365,000.00
B	May 30 2018	Cofina Bond	74529JGP4	\$675,000.00
C	May 30 2018	Cofina Bond	74529JLD5	\$405,000.00

5. These specific claims are not included within the master proof of claim. Further, creditor has noticed that these claims also haven't been uploaded to the claim register in Prime Clerk.

6. Although the aforementioned may be due to a mistake or inobservance of some kind, the truth is that up to this date, the master proof of claim does not account for all this creditor's claims as filed.

7. The creditor has provided sufficient evidence for all its claims to be accounted for within this proceeding, either in a master proof of claim or otherwise.

8. As such, the creditor prays that in regard with its claims and interest within this case, the Sixteenth Omnibus Objection at Docket Entry 4420 be denied inasmuch it does not account for all this creditors claims as properly filed with the Court. The Sixteenth Omnibus Objection states that it has recognized or file on behalf of the creditor three (3) claims in an aggregate of \$2,205,000, when in fact, there should be six (6) claims in the aggregate amount of \$3,650,000.00.

9. Section 502(a) of the Bankruptcy Code, 11 U.S.C. §502(a), states that a proof of claim is deemed to be allowed unless an objection is presented. COFINA objected to the validity of Vincenty's claim for alleged duplicity. The documents presented in this response, serve as the corroborating evidence that Cofina is not taking in account significant amounts of this creditor's claims and interests.

10. Given the above, Vincenty respectfully asks this court to deny the Sixteenth Omnibus Objection with respect to this creditor.

RESPECTFULLY SUBMITTED.

I HEREBY CERTIFY that on this date, I have electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel of record.

In San Juan, Puerto Rico, this 1st day of February, 2019.

S/ Alexis A. Betancourt Vincenty
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